

February 28, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, S.W., Suite TW-A325 Washington, DC 20554

RE: Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Covering Calendar Year 2012

EB Docket No. 06-36

Commonwealth Communications Systems, Inc. FCC 499 Filer ID 825806 - FRN 0007320989

Dear Ms. Dortch:

Commonwealth Communications Systems, Inc., by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits the attached letter in response to DA 13-61 regarding the FCC's annual CPNI Certification.

If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,

Katherine Patsas Nevitt

Enclosures

cc: Best Copy and Printing, Inc.



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Re:

47 C.F.R. § 64.2009(e) CPNI Certification

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Commonvealth Communications Systems, Inc. FCC 499 Filer ID 825806 - FRN 0007320989

Dear Ms. Dortch:

Commonwealth Communications Systems, Inc. ("Company") hereby files this letter in lieu of a Customer Proprietary Network Information ("CPNI") certification statement. In an Order dated December 3, 2010 (DA 10-2282) ("December 2010 Order"), the Federal Communications Commission ("FCC") rescinded Notices of Apparent Liability for Forfeiture ("NALFs") against several hundred entities stating that the FCC had determined that those entities did not have an obligation to submit a CPNI certification for the year in question. A number of those entities had responded to the NALFs by explaining that they operated two-way radio, dispatch-only systems that were not interconnected with the public switched network. The Company operates a nor-interconnected, two-way radio, dispatch-only system identical to the operations described by those entities. Accordingly, the Company believes it is not required to make an annual CPNI filing.

Please note that the Company will not make any future CPNI-related fillings unless the Company modifies its current service offerings to include those for which a CPNI certification is required or unless the Company is directed to file by the FCC. Should the Commission have any questions, please contact the undersigned or the Company's counsel, Elizabeth R. Sachs, at 703-584-8663 or at lsachs@fcclaw.com.

Name: Mary VanBrackel

Title: CFO

Date: February 28, 2013